

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - NSPS SOURCE -- RENEWAL

PERMITTEE

Nexeo Solutions LLC
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<u>Application No.:</u> 73020131	<u>I.D. No.:</u> 031327AAC
<u>Applicant's Designation:</u>	<u>Date Received:</u> July 22, 2009
<u>Subject:</u> Organic Liquids Bulk Terminal	
<u>Date Issued:</u>	<u>Expiration Date:</u>
<u>Location:</u> 8500 South Willow Springs Road, Willow Springs, Cook County, 60480	

Permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of twenty-eight (28) 15,000 gallon storage tanks (including 1 tank with internal floating roof), twenty-nine (29) 40,000 gallon storage tanks (including 8 tanks with internal floating roof) and one (1) 10,000 gallon storage tank, five (5) blending tanks, tank truck unloading/loading rack, rail car unloading system, two (2) container filling rooms, groundwater air stripper and one (1) 12.6 mmBtu/hour natural gas-fired boiler pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
- i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Volatile Organic Material (VOM) and 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year for any combination of such HAPs). As a result, the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
 - ii. To establish federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs so that the source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Organic Liquids Distribution (Non-Gasoline), 40 CFR 63 Subpart EEEE.
 - iii. To establish federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs so that the source is not subject to the requirements of the National Emission

Standards for Hazardous Air Pollutants (NESHAP) for Site Remediation, 40 CFR 63 Subpart GGGGG.

- iv. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- v. To establish federally enforceable production and operating limitations, which restrict the potential to emit for VOM to less than 25 tons per year so that the air stripper at this source is not subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart TT (Other Emission Units).
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) for this location.
- 2a. The 40,000 gallon storage tanks are subject to New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels, 40 CFR 60, Subparts A and Kb. The Illinois EPA is administering the NSPS in Illinois on behalf of the United States EPA under a delegation agreement. Pursuant to 40 CFR 60.110b(a), except as provided in 40 CFR 60.110b(b), the affected facility to which 40 CFR 60 Subpart Kb applies is each storage vessel with a capacity greater than or equal to 75 cubic meters (m^3) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.
- b. Pursuant to 40 CFR 60.112b(a)(1), the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m^3 (39,889.67 gallons) containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa (0.75 psia) but less than 76.6 kPa (11.1 psia) or with a design capacity greater than or equal to 75 m^3 (19,815.75 gallons) but less than 151 m^3 (39,889.67 gallons) containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 27.6 kPa (4.00 psia) but less than 76.6 kPa (11.11 psia), shall equip each storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications:
 - i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

- ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
 - A. A foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
 - B. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
 - C. A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- iii. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
- iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
- v. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
- vi. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
- viii. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

- ix. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- 3a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
- 4. Pursuant to 35 Ill. Adm. Code 216.121, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air.
- 5a. Pursuant to 35 Ill. Adm. Code 218.120(a)(1), every owner or operator storing VOL in a vessel of 40,000 gallons or greater with a maximum true vapor pressure equal to 0.75 psia but less than 11.1 psia shall reduce VOM emissions from storage tanks, reservoirs, or other containers as follows: Each fixed roof tank shall be equipped with an internal floating roof that meets the following specifications or that is equipped with a vapor control system that meets the specifications contained in 35 Ill. Adm. Code 218.120(a)(4) below:
 - i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied and subsequently refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
 - ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
 - A. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the

- floating roof continuously around the circumference of the tank;
- B. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous; or
 - C. A mechanical shoe seal, which is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- iii. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
 - iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
 - v. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
 - vi. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
 - vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
 - viii. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- b. Pursuant to 35 Ill. Adm. Code 218.122(a), no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere during the loading of any organic material from the aggregate loading pipes of any loading area having through-put of greater than 151 cubic meters per day (40,000 gal/day) into any railroad tank car, tank truck or trailer unless such loading area is equipped with submerged loading pipes or a device that is equally effective in controlling emissions and is approved by the Illinois EPA

according to the provisions of 35 Ill. Adm. Code Part 201, and further processed consistent with 35 Ill. Adm. Code 218.108.

- c. Pursuant to 35 Ill. Adm. Code 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code Part 201 or unless such tank is a pressure tank as described in 35 Ill. Adm. Code 218.121(a) or is fitted with a recovery system as described in 35 Ill. Adm. Code 218.121(b)(2).
 - d. Pursuant to 35 Ill. Adm. Code 218.142, no person shall cause or allow the discharge of more than 32.8 ml (2 cu in) of volatile organic liquid with vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F) into the atmosphere from any pump or compressor in any 15 minute period at standard conditions.
 - e. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G (Use of Organic Material) shall apply only to photochemically reactive material.
6. Pursuant to 40 CFR 60.110b(b), 40 CFR 60 Subpart Kb does not apply to storage vessels with a capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) or with a capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure less than 15.0 kPa.
- 7a. This permit is issued based upon the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Organic Liquids Distribution (Non-Gasoline), 40 CFR 63 Subpart EEEE, because the organic liquids distribution (OLD) (non-gasoline) operation is not located at, or is part of, a major source of HAP emissions.
- b. This permit is issued based on the Air Stripper at this source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Site Remediation, 40 CFR 63 Subpart GGGGG. This is a result of the federally enforceable production and operating limitations, which were established in this permit to restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.
- c. This permit is issued based on the storage tanks at this source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities, 40 CFR 63 Subpart BBBBBB, because the source is not a bulk gasoline terminal, pipeline breakout station, pipeline pumping station, or bulk gasoline plant.

- 8a. Pursuant to 35 Ill. Adm. Code 218.119(g), the limitations of 35 Ill. Adm. Code 218.120 (Control Requirements for Storage Containers of VOL) shall apply to all storage containers of volatile organic liquid (VOL) with a maximum true vapor pressure of 0.5 psia or greater in any stationary tank, reservoir, or other container of 151 cubic meters (40,000 gallons) capacity or greater, except to vessels with storage capacity less than 40,000 gallons must comply with 35 Ill. Adm. Code 218.129(f).
- b. Pursuant to 35 Ill. Adm. Code 218.122(c), if no odor nuisance exists the limitations of 35 Ill. Adm. Code 218.122 shall only apply to the loading of VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F).
9. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
- 10a. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- b. The boiler shall only be operated with natural gas as the fuel. The use of any other fuel in the boiler requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- 11a. The VOM emissions from the chemical processing operations shall not exceed the following limits:

<u>Operation</u>	<u>Throughput</u>		<u>VOM Emissions</u>	
	<u>(10³ gal/mo)</u>	<u>(10³ gal/yr)</u>	<u>(ton/mo)</u>	<u>(ton/yr)</u>
Storage Tanks	6,163	49,300	0.54	4.3
Blending Tank, Truck and Drum Filling	6,313	50,500	1.58	<u>12.6</u>
			Total:	16.9

These limits are based on the maximum equipment operation and VOM emissions calculated using equations given by standard emission formulas and factors: organic liquids storage tank operations - Section 7.1, AP-42 5th edition, Volume I, November 2006 and utilized in the TANKS Program Version 4.09D; blending tanks, truck and drum filling operations - Section 5.2, AP-42 5th edition, Volume I, July 2008.

- b. Fugitive VOM emissions from the terminal operations shall not exceed 0.63 ton/mo and 5.0 ton/yr. It shall be calculated using USEPA SOCMF factors (EPA-453/R-95-017).
- c. Operation of and emissions from the natural gas fired boiler shall not exceed the following limits:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lbs/mmscf)</u>	<u>Emissions</u> <u>(lbs/Hr)</u>	<u>(Tons/Yr)</u>
Carbon Monoxide (CO)	84.0	1.06	4.64
Nitrogen Oxides (NO _x)	100.0	1.26	5.52
Particulate Matter (PM)	7.6	0.10	0.42
Sulfur Dioxide (SO ₂)	0.6	0.01	0.03
Volatile Organic Material (VOM)	5.5	0.07	0.30

This limit is based on the maximum firing rate (12.6 mmBtu/hr), year round operation (8,760 hours/year), and standard emission factor (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July, 1998).

- d. This permit is issued based on negligible emissions of VOM from the groundwater air stripper. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
 - e. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA, the NESHAP for Organic Liquids Distribution (Non-Gasoline), 40 CFR 63 Subpart EEEE, and the NESHAP for Site Remediation, 40 CFR 63 Subpart GGGG.
 - f. Compliance with annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 12a. Pursuant to 40 CFR 60.113b(a), after installing the control equipment required to meet 40 CFR 60.112b(a)(1) (permanently affixed roof and internal floating roof), each owner or operator shall:
- i. Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.
 - ii. For Vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through

manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Illinois EPA or USEPA in the inspection report required in 40 CFR 60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

iii. For vessels equipped with a double-seal system as specified in 40 CFR 60.112b(a)(1)(ii)(B):

A. Visually inspect the vessel as specified in 40 CFR 60.113b(a)(4) at least every 5 years; or

B. Visually inspect the vessel as specified in 40 CFR 60.113b(a)(2).

iv. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in 40 CFR 60.113b(a)(2) and (a)(3)(ii) and at intervals no greater than 5 years in the case of vessels specified in 40 CFR 60.113b(a)(3)(i).

13a. Pursuant to 35 Ill. Adm. Code 218.127(a), the owner or operator of each storage vessel specified in 35 Ill. Adm. Code 218.119 shall comply with the requirements of 35 Ill. Adm. Code 218.127(a), (b), or (c) below. The applicable subsection for a particular storage vessel depends on the control equipment installed to meet the requirements of 35 Ill. Adm. Code 218 Subpart B. After installing the control equipment necessary for the source to comply with the requirements of 35 Ill. Adm. Code 218.120(a)(1) or (2) (permanently affixed roof and internal floating roof), each owner or operator shall:

- i. Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service) prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.
- ii. For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or if there is liquid accumulated on the roof, or if the seal is detached, or if there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this subsection cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, the owner or operator may request a 30-day extension from the Illinois EPA in the inspection report required in 35 Ill. Adm. Code 218.129(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the owner or operator will take that will assure that the control equipment will be repaired or the vessel will be emptied within 30 days.
- iii. For vessels equipped with both primary and secondary seals:
 - A. Visually inspect the vessel as specified in 35 Ill. Adm. Code 218.127(a)(4) below at least every 5 years; or
 - B. Visually inspect the vessel as specified in 35 Ill. Adm. Code 218.127(a)(2) above.
- iv. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes, and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal, or if the seal fabric or the secondary seal has holes, tears, or other openings in the seal, or if the seal fabric or the gaskets no longer close off the liquid surfaces from the atmosphere, or if the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this subsection exists before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in 35 Ill. Adm. Code 218.127(a)(2) and (a)(3)(B) above and at

intervals no greater than 5 years in the case of vessels specified in 35 Ill. Adm. Code 218.127(a)(3)(A) above.

- b. Pursuant to 35 Ill. Adm. Code 218.128(c), the owner or operator of each vessel storing a mixture of indeterminate or variable composition shall be subject to the following:
 - i. Prior to the initial filling of the vessel, the maximum true vapor pressure for the range of anticipated liquid compositions to be stored will be determined using the methods described in 35 Ill. Adm. Code 218.128(b).
 - ii. For vessels in which the vapor pressure of the anticipated liquid composition is 0.5 psia or greater but less than 0.75 psia, an initial physical test of the vapor pressure is required; a physical test at least once every 6 months thereafter is required as determined by the following methods:
 - A. ASTM Method D2879-83;
 - B. ASTM Method D323-82; or
 - C. As measured by an appropriate method approved by the Illinois EPA.
- 14a. Pursuant to 40 CFR 60.7(b), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.
- b. Pursuant to 40 CFR 60.7(f), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records.
- 15a. Pursuant to 40 CFR 60.115b, the owner or operator of each storage tanks vessel as specified in 40 CFR 60.112b(a) shall keep records and furnish reports as required by 40 CFR 60.115b(a), (b), or (c) depending upon the control equipment installed to meet the requirements of 40 CFR 60.112b. The owner or operator shall keep copies of all reports and records required by 40 CFR 60.115b, except for the record required by 40 CFR 60.115b(c)(1), for at least 2 years. The record required by 40 CFR 60.115b(c)(1) will be kept for the life of the control equipment.

- b. Pursuant to 40 CFR 60.115b(a)(2), after installing control equipment in accordance with 40 CFR 60.112b(a)(1) (fixed roof and internal floating roof), the owner or operator shall keep a record of each inspection performed as required by 40 CFR 60.113b (a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
 - c. Pursuant to 40 CFR 60.116b(a), the owner or operator shall keep copies of all records required by 40 CFR 60.116b, except for the record required by 40 CFR 60.116b(b), for at least 2 years. The record required by 40 CFR 60.116b(b) will be kept for the life of the source.
 - d. Pursuant to 40 CFR 60.116b(b), the owner or operator of each storage vessel as specified in 40 CFR 60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.
 - e. Pursuant to 40 CFR 60.116b(c), except as provided in 40 CFR 60.116b(f) and (g), the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa or with a design capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure greater than or equal to 15.0 kPa shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.
16. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to Section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability

determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

- 17a. Pursuant to 35 Ill. Adm. Code 218.120(b)(6), subject to 35 Ill. Adm. Code 218.120(a) no owner or operator of a stationary storage tank shall cause or allow the storage of any volatile petroleum liquid in the tank unless a record of the results of each inspection conducted under 35 Ill. Adm. Code 218.120(b)(4) or (b)(5) is maintained.
- b. Pursuant to 35 Ill. Adm. Code 218.129, the owner or operator of each storage vessel specified in 35 Ill. Adm. Code 218.120(a) shall maintain records and furnish reports as required by 35 Ill. Adm. Code 218.129(a), (b), or (c) below as appropriate for the control equipment installed to meet the requirements of 35 Ill. Adm. Code 218.120. The owner or operator shall keep copies of all reports and records required by this Section, except for the records required by 35 Ill. Adm. Code 218.129(c)(1) below, for at least 3 years. The records required by 35 Ill. Adm. Code 218.129(c)(1) below shall be kept for the life of the control equipment.
- i. After installing control equipment in accordance with 35 Ill. Adm. Code 218.120(a)(1) or (2) (fixed roof and internal floating roof), the owner or operator shall keep a record of each inspection performed as required by 35 Ill. Adm. Code 218.127(a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings)
- ii. The owner or operator shall maintain all records required by 35 Ill. Adm. Code 218.129, except for the records required by 35 Ill. Adm. Code 218.129(f) below, for at least 3 years. The records required by 35 Ill. Adm. Code 218.129(f) below shall be kept for the life of the source.
- iii. The owner or operator of each storage vessel specified in 35 Ill. Adm. Code 218.119 shall maintain readily accessible records of the dimension of the storage vessel and an analysis of the capacity of the storage vessel. Each storage vessel with a design capacity less than 40,000 gallons is subject to no provisions of 35 Ill. Adm. Code Part 218 other than those required by maintaining readily accessible records of the dimensions of the storage vessel and analysis of the capacity of the storage vessel.
- iv. Except as provided in 35 Ill. Adm. Code 218.128(c) and (d), the owner or operator of each storage vessel subject to the requirements in 35 Ill. Adm. Code 218.120 with a design capacity greater than or equal to 40,000 gallons storing a liquid with a

maximum true vapor pressure greater than or equal to 0.5 psia but less than 0.75 psia shall maintain a record of the VOL storage, the period of storage, and the maximum true vapor pressure of the VOL during the respective storage period.

- 18a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. For each storage or blending tank, each loading/unloading area and each container filling room:
 - A. Names and identification number of materials transferred and/or stored;
 - B. Material throughput (gal/mo, gal/yr);
 - ii. Storage tank throughput of each tank (gallons/month and gallons/year);
 - iii. Name or identification of material stored in each tank;
 - iv. Dates, times, and durations when the internal floating roof(s) on the 8 Storage Tanks equipped with internal floating roofs rest on their legs resulting in landing losses;
 - v. Material throughput of the 8 Storage Tanks equipped with internal floating roofs (gallons/month and gallons/year) when the floating roof(s) rest on their legs resulting in landing losses;
 - vi. Name or identification of material stored in the 8 Storage Tanks equipped with internal floating roofs when the floating roof(s) rest on their legs resulting in landing losses;
 - vii. Vapor pressure of each material stored in or transferred to the 8 Storage Tanks equipped with internal floating roofs (psi) when the floating roof(s) rest on their legs resulting in landing losses;
 - viii. Name or identification of material and throughput through each loading rack;
 - ix. Vapor pressure of each material (psia);
 - x. Natural gas usage of the boiler (mmscf/month and mmscf/year); and
 - xi. Monthly and annual emissions of CO, NO_x, PM, SO₂, VOM, and HAPs with supporting calculations (tons/month, tons/year). HAP emissions may be assumed proportional to HAP/VOM ratio in processed chemicals.
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and

copying by the Illinois EPA and USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to Illinois EPA or USEPA request for records during the course of a source inspection.

- 19a. Pursuant to 40 CFR 60.113b(a)(5), after installing the control equipment required to meet 40 CFR 60.112b(a)(1) (permanently affixed roof and internal floating roof), each owner or operator shall notify the Illinois EPA or USEPA in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by 40 CFR 60.113b(a)(1) and (a)(4) to afford the Illinois EPA or USEPA the opportunity to have an observer present. If the inspection required by 40 CFR 60.113b(a)(4) is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Illinois EPA or USEPA at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Illinois EPA or USEPA at least 7 days prior to the refilling.
- b. Pursuant to 40 CFR 60.113b(b)(5), after installing the control equipment required to meet 40 CFR 60.112b(a)(2) (external floating roof), the owner or operator shall notify the Illinois EPA or USEPA 30 days in advance of any gap measurements required by 40 CFR 60.113b(b)(1) to afford the Illinois EPA or USEPA the opportunity to have an observer present.
- c. Pursuant to 40 CFR 60.113b(b)(6)(ii), for all the inspections required by 40 CFR 60.113b(b)(6), the owner or operator shall notify the Illinois EPA or USEPA in writing at least 30 days prior to the filling or refilling of each storage vessel to afford the Illinois EPA or USEPA the opportunity to inspect the storage vessel prior to refilling. If the inspection required by 40 CFR 60.113b(b)(6) is not planned and the owner or operator could not have known about the inspection 30 days in advance of refilling the tank, the owner or operator shall notify the Illinois EPA or USEPA at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Illinois EPA or USEPA at least 7 days prior to the refilling.
- d. Pursuant to 40 CFR 60.115b(a), after installing control equipment in accordance with 40 CFR 60.112b(a)(1) (fixed roof and internal floating roof), the owner or operator shall meet the following requirements.
 - i. If any of the conditions described in 40 CFR 60.113b(a)(2) are detected during the annual visual inspection required by 40 CFR

- 60.113b(a)(2), a report shall be furnished to the Illinois EPA or USEPA within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
- ii. After each inspection required by 40 CFR 60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR 60.113b(a)(3)(ii), a report shall be furnished to the Illinois EPA or USEPA within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR 61.112b(a)(1) or 40 CFR 60.113b(a)(3) and list each repair made.
- e. Pursuant to 40 CFR 60.116b(d), except as provided in 40 CFR 60.116b(g), the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure that is normally less than 5.2 kPa or with a design capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure that is normally less than 27.6 kPa shall notify the Illinois EPA or USEPA within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range.
- 20a. Pursuant to 35 Ill. Adm. Code 218.127(a)(5), the owner or operator of each storage vessel specified in 35 Ill. Adm. Code 218.119 shall comply with the requirements of 35 Ill. Adm. Code 218.127(a), (b), or (c) below. The applicable subsection for a particular storage vessel depends on the control equipment installed to meet the requirements of 35 Ill. Adm. Code 218 Subpart B. After installing the control equipment necessary for the source to comply with the requirements of 35 Ill. Adm. Code 218.120(a)(1) or (2) (permanently affixed roof and internal floating roof), each owner or operator shall notify the Illinois EPA in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by 35 Ill. Adm. Code 218.127(a)(1) and (a)(4) to afford the Illinois EPA the opportunity to have an observer present. If the inspection required by 35 Ill. Adm. Code 218.127(a)(4) is not planned and the owner or operator could not have known about the inspection 30 days in advance of refilling the tank, the owner or operator shall notify the Illinois EPA at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Illinois EPA at least 7 days prior to the refilling.
- b. Pursuant to 35 Ill. Adm. Code 218.128(a), except as provided in 35 Ill. Adm. Code 218.128(d), the owner or operator of each storage vessel with a design capacity greater than or equal to 40,000 gallons storing a liquid with a maximum true vapor pressure that is normally less than

0.75 psia shall notify the Illinois EPA within 30 days when the maximum true vapor pressure of the liquid exceeds 0.75 psia.

- c. Pursuant to 35 Ill. Adm. Code 218.129(a), the owner or operator of each storage vessel specified in 35 Ill. Adm. Code 218.120(a) shall maintain records and furnish reports as required by 35 Ill. Adm. Code 218.129(a), (b), or (c) below as appropriate for the control equipment installed to meet the requirements of 35 Ill. Adm. Code 218.120. The owner or operator shall keep copies of all reports and records required by this Section, except for the records required by 35 Ill. Adm. Code 218.129(c)(1) below, for at least 3 years. The records required by 35 Ill. Adm. Code 218.129(c)(1) below shall be kept for the life of the control equipment. After installing control equipment in accordance with 35 Ill. Adm. Code 218.120(a)(1) or (2) (fixed roof and internal floating roof), the owner or operator shall:
 - i. If any of the conditions described in 35 Ill. Adm. Code 218.127(a)(2) are detected during the annual visual inspection required by 35 Ill. Adm. Code 218.127(a)(2), report to the Illinois EPA within 30 days after the inspection the identity of the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made; and
 - ii. After each inspection required by 35 Ill. Adm. Code 218.127(a)(3) where holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 35 Ill. Adm. Code 218.127(a)(3)(B) are discovered, report to the Illinois EPA within 30 days after the inspection the identity of the storage vessel and the reason it did not meet the specifications of 35 Ill. Adm. Code 218.120(a)(1) or (2) or 35 Ill. Adm. Code 218.127(a), and list each repair made.
- 21a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
- b. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

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Illinois Environmental Protection Agency
Division of Air Pollution Control - Regional Office
9511 West Harrison
Des Plaines, Illinois 60016

If you have any questions on this permit, please call Valeriy Brodsky at 217/785-1705.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

REP:VJB:

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emissions Summary/

This attachment provides a summary of the maximum emissions from the bulk terminal plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (e.g., 100 tons/year for VOM, 10 tons/year for any single HAP, and 25 tons/year for any combination of such HAPs) at which this source would be considered a major source for purposes Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)					Single	Combined
	<u>CO</u>	<u>NO_x</u>	<u>PM</u>	<u>SO₂</u>	<u>VOM</u>	<u>HAP</u>	<u>HAPs</u>
Storage Tanks					4.30		
Blending Tank, Truck & Drum Filling					12.60		
Fugitive Emissions from Terminal Operations					5.00		
Boiler	4.64	5.52	0.42	0.03	0.30		
Groundwater Air Stripper	--	--	--	--	0.44	--	--
Totals	4.64	5.52	0.42	0.03	22.64	9.0	22.5

REP:VJB: